



North County Group
Sierra Club San Diego
P.O. Box 2141
Escondido, CA 92033

August 28, 2018

Mr. Hossein Nassiri, DTSC Project Manager
5796 Corporate Avenue
Cypress, California 90630

RE: Sierra Club North County Group comments on Five-Year Remedy Review Report for Chatham Brothers Barrel Yard, Escondido

Dear Mr. Nassiri:

The Sierra Club North County Group (NCG) represents 2,700 members in the inland North County area, including in Escondido and environs. Several of our members have contacted us about the issues at the Chatham Brothers Barrel Yard remediation. As we understand it, members of the Chatham family owned the property at 2257 Bernardo Ave, Escondido and ran a hazardous waste processing and collection business for decades. In the early 1980's, massive pollution of the site was discovered and the facility was closed. The Chatham Barrel yard was listed as a state superfund site and emergency soil removal action was conducted. Additionally, on-site water remediation has been on-going for over 20 years.

However, in the intervening decades, the groundwater pollution has spread significantly and can now be found under Felicita County Park and many area homes. Further, the contamination is now entering Felicita Creek in a public area where the public is unwittingly exposed.

In spite of over 30 years of remedial action, much of it passive through the adoption of a passive strategy called 'natural attenuation', the cleanup objectives have not been met. It is clear that more proactive measures must be taken.

We have been notified that the Five-Year Remedy Review Report is underway and NCG would like to provide comments and recommendations for your consideration.

Sierra Club NCG requests the Department of Toxic Substances Control, as lead agency, take the following actions prior to certification of the Review.

1. Make a finding that, after 30 years of implementation of natural attenuation as a remedial action, the remedial objectives have not been met.
2. Direct additional proactive measures to achieve the remedial objectives, especially to stop unabated discharges into Felicita Creek.
3. Establish and timeline of performance for meeting the objectives.

Please add us to your mailing list conservation@sierrablucncg.org .

Thank you for your consideration,

Suzi Sandore, Chair
Sierra Club NCG

cc. David Gibson, Regional Water Quality Control Board